

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Southern California Edison Company (E 3338-E) for Authority to Institute a Rate Stabilization Plan with a Rate Increase and End of Rate Freeze Tariffs.

Application 00-11-038
(Filed November 16, 2000)

Emergency Application of Pacific Gas and Electric Company to Adopt a Rate Stabilization Plan. (U 39 E)

Application 00-11-056
(Filed November 22, 2000)

Petition of THE UTILITY REFORM NETWORK for Modification of Resolution E-3527.

Application 00-10-028
(Filed October 17, 2000)

(See Appendix A for a list of appearances.)

**OPINION ON PG&E'S MARKET VALUATION
APPROACH FOR DETERMINING A REVENUE
REQUIREMENT FOR UTILITY RETAINED GENERATION**

This decision addresses the market valuation proposal of Pacific Gas and Electric Company (PG&E) for determining a revenue requirement for its utility retained generation (URG) assets.¹ The issue we consider is whether Pub. Util. Code § 367(b) requires the Commission to use a market valuation in determining

¹ In this decision, consistent with Decision (D.) 01-01-061, we define URG broadly to mean generation under the control of the utility.

a prospective URG revenue requirement for PG&E. We determine that market valuation does not apply to setting a prospective revenue requirement for PG&E's URG assets.

We also address PG&E's proposal to recover in its URG revenue requirement amounts in the Transition Cost Balancing Account (TCBA). We find that PG&E's proposal raises issues that deal with matters other than determining a prospective URG revenue requirement. We therefore find it is inappropriate to include in PG&E's prospective URG requirement amounts contained in its TCBA.

Procedural Background

Between July 23, and July 31, 2001, seven days of evidentiary hearing were held to determine the URG revenue requirements of PG&E, Southern California Edison Company (Edison) and San Diego Gas & Electric Company (SDG&E). At the conclusion of the evidentiary hearing, the administrative law judge (ALJ) set a schedule for filing and serving briefs, and preparing a proposed decision. By Assigned Commissioner Ruling (ACR) dated August 10, 2001, President Lynch accelerated the briefing schedule by directing parties to file and serve briefs on August 17, 2001, that addressed the issue of whether a market valuation approach for determining URG revenue requirements should be used. Further, the ACR directed parties to comment on their willingness to reduce the 30-day review and comment period prescribed by Pub. Util. Code § 311(d).² On August 16, President Lynch issued an ACR accelerating the briefing schedule on

² Unless otherwise stated, all statutory references are to the Public Utilities Code.

remaining issues by directing parties to file and serve concurrent opening briefs on August 22 and concurrent reply briefs on August 29.

In response to the August 10th ACR, PG&E, Edison, Office of Ratepayer Advocates (ORA), California Large Energy Consumers Association (CLECA) and The Utility Reform Network (TURN) filed and served briefs. PG&E and Edison chose not to stipulate to reduce the comment period prescribed by Section 311(d).

PG&E's Market Valuation Proposal

In its testimony, PG&E presented three scenarios for calculating its URG revenue requirement. This section addresses PG&E's preferred scenario³ to set URG revenue requirements for its non-nuclear generation assets (hydroelectric facilities) by valuing its generation assets as if sold in a competitive auction or other arms length sale. PG&E estimates such a sale price using a discounted cash flow (DCF) analysis, based on plant revenues derived from a market price forecast made by Henwood Energy Services in November 2000. The market valuation PG&E assigns to its hydroelectric facilities, including its Helms Pumped Storage facility, is \$4.1 billion. PG&E's contends that the Commission is obligated, under Section 367, to determine the market value of PG&E's hydroelectric assets prior to calculating PG&E's URG revenue requirement.

In support of its interpretation of Section 367, PG&E states that the Commission must reconcile the requirement for an appraisal of market value under Section 367 and how that appraised value relates to the ratemaking of its generation assets going forward.

³ PG&E's proposed Scenarios 2 and 3 do not raise any market valuation issues and are therefore not addressed in this section.

PG&E suggest that enactment of Assembly Bill 6 of the First Extraordinary Session of 2000-2001 (ABX1-6) created conflicting or inconsistent provisions that the Commission must reconcile. PG&E asserts that ABX1-6 rededicated PG&E's generation assets to public utility service and that this rededication affected PG&E's ability to receive market value payments in a deregulated marketplace. Since the market valuation provision of Section 367(b) remains in place, PG&E believes that "two seemingly contradictory goals" now exist. PG&E describes these goals as (1) "ratepayers being entitled to the positive economic value of utility generation assets as a credit against CTCs" and (2) PG&E being precluded from recouping the "positive" value of its generation assets in deregulated markets. To reconcile these goals in a manner that is non-confiscatory, PG&E proposes to treat its generation assets as if they are being dedicated to public service for the first time and use a value equal to PG&E's original investment (market value). PG&E also believes that ABX1-6's "re-regulation" of PG&E's retained generating assets may constitute an unconstitutional taking under the California and U.S. Constitutions. However, PG&E did not directly address that issue since the Commission lacks authority to declare a statute unconstitutional.

ORA, TURN, CLECA and Aglet Consumer Alliance (Aglet) oppose PG&E's market valuation approach.

ORA asserts the scope of this proceeding encompasses traditional cost-based ratemaking and not market valuation. ORA contends that determining revenue requirements for URG is separate and distinct from valuation issues. Because valuation will affect rates for years to come, ORA believes that valuation issues should be decided in a proceeding or phase explicitly designed to do so, where all parties have a clear understanding at the outset that valuation issues will be considered.

ORA argues that only the net book value reflects the utility's actual recorded investment in generation facilities. ORA states that historically this Commission has authorized utilities to calculate depreciation based on the actual cost of their investments. The utilities then recover their investments for generation facilities from ratepayers through depreciation expense. ORA contends that ratepayers would pay twice for depreciation if the Commission allowed PG&E to use a market valuation for rate base for facilities in which it has already recovered depreciation in rates.

CLECA opposes PG&E's efforts to increase its rate base for its hydroelectric generating assets from its current depreciated book value of approximately \$500 million to a market-based figure of approximately \$4 billion. CLECA characterizes PG&E's proposal as inconsistent with Assembly Bill (AB) 1890 and ABX1-6.

CLECA asserts that PG&E confuses market valuation for purposes of transition cost recovery with ongoing ratemaking for URG assets. CLECA argues that no confusion exists. CLECA states that Section 367 relates to and was enacted for the express purpose of setting forth the basis for utility recovery of stranded costs. CLECA contends that Section 367 does not address the manner in which cost-of-service rates are to be established for URG assets prospectively.

CLECA states that PG&E offers no specific reference to any words in Section 367 to support its assertion that the market valuation of an asset that is retained and which remains dedicated to public utility service must be recoverable in retail rates. CLECA argues that contrary to PG&E's argument, the purpose of the market valuation provisions within Section 367(b) is to enable the "netting" of the above market value of certain assets against the below market value of other assets. CLECA states that Section 367 has nothing at all to do with

the manner in which the Commission is to perform cost-of-service ratemaking prospectively.

CLECA also contends that PG&E's proposal would cause a double recovery of investment in URG assets and would substantially increase customers' payments. CLECA states that over time, PG&E customers have paid the capital costs of the generation assets through the depreciation element of the utility cost-of-service based revenue requirement. CLECA further asserts that AB 1890 accelerated recovery of such capital costs and PG&E received billions of dollars from ratepayers under frozen rates for capital recovery associated with such URG assets. For those assets that are to be retained by the utility and remain, pursuant to ABX1-6, dedicated to utility service, CLECA asserts the rate base must be the net depreciated book value.

TURN asserts the Commission is not obliged to use a market valuation for setting PG&E's URG revenue requirement. TURN contends the URG revenue requirement is generally distinct from any claim for cost recovery for costs incurred in the past. TURN states that PG&E's current position on market valuation reflects a misunderstanding as to the intended purpose of the rate freeze, market valuation, and the opportunity for transition cost recovery. TURN states that any argument about recovery of generation costs deemed uneconomic at the time the accelerated cost recovery opportunity began, is separate from the determination of how to establish the revenue requirement on a going forward basis for URG.

TURN contends that the legislative history of ABX1-6 shows that PG&E is incorrect in assuming that market valuation is required for purposes other than calculating stranded cost recovery. TURN states that when the Legislature enacted ABX1-6, it eliminated the discussion of "market valuation" in

Sections 216, 330 and 377. It did not, however, revise Section 367. PG&E's claim that market valuation is required as part of establishing the URG revenue requirement is largely premised on the absence of any modification to Section 367.

TURN believes that the fact that ABX1-6 did not modify Section 367 is largely irrelevant for purposes of resolving the URG revenue requirement issues. The recently-enacted statute substantially modified the provisions of AB 1890 that had been read to suggest that market valuation might impact the ongoing regulation and ratemaking of URG facilities. TURN states that the market valuation reference that remains in Section 367 refers only to recovery of uneconomic costs. It does not otherwise address ratemaking practices for URG assets.

Aglet argues that the purpose of Section 367 is recovery of transition costs, not calculation of ongoing rates, and that the Public Utilities Code does not require the Commission to rely on market valuation for determination of reasonable base rate revenue requirements. Even if the Commission were to rely on market valuation, Aglet believes PG&E's \$4.1 billion estimate of market value is badly flawed.

Discussion

The primary legal issue raised is whether Section 367(b) requires the Commission to establish a market valuation for PG&E's non-nuclear generation assets prior to determining a URG revenue requirement.

Section 367 states that:

“The commission shall identify and determine those costs and categories of costs for generation-related assets and obligations, consisting of generation facilities, generation-related regulatory assets, nuclear settlements, and power purchase contracts,

including, but not limited to, restructurings, renegotiations or terminations thereof approved by the commission, that were being collected in commission-approved rates on December 20, 1995, and that may become uneconomic as a result of a competitive generation market, in that these costs may not be recoverable in market prices in a competitive market, and appropriate costs incurred after December 20, 1995, for capital additions to generating facilities existing as of December 20, 1995, that the commission determines are reasonable and should be recovered, provided that these additions are necessary to maintain the facilities through December 31, 2001. These uneconomic costs shall include transition costs as defined in subdivision (f) of Section 840, and shall be recovered from all customers or in the case of fixed transition amounts, from the customers specified in subdivision (a) of Section 841, on a nonbypassable basis and shall.”

...

“(b) Be based on a calculation mechanism that nets the negative value of all above market utility-owned generation-related assets against the positive value of all below market utility-owned generation related assets. For those assets subject to valuation, the valuations used for the calculation of the uneconomic portion of the net book value shall be determined not later than December 31, 2001, and shall be based on appraisal, sale, or other divestiture. The commission's determination of the costs eligible for recovery and of the valuation of those assets at the time the assets are exposed to market risk or retired, in a proceeding under Section 455.5, 851, or otherwise, shall be final, and notwithstanding Section 1708 or any other provision of law, may not be rescinded, altered or amended.”

Section 367 concerns recovery of uneconomic costs, not the establishment of revenue requirements. Section 367 provides a framework for “netting” of the above market value of certain assets against the below market value of other assets. Section 367 relates to, and was enacted for the express purpose of, setting

forth the basis for utility recovery of uneconomic costs. Contrary to PG&E's assertions, Section 367 does not address the manner in which we establish prospective cost-of-service URG revenue requirements.

Therefore, in reviewing the plain language of Section 367, we agree with ORA, TURN, Aglet and CLECA that the market valuation reference in Section 367 applies only to the process of determining uneconomic cost recovery and not ratemaking practices for URG assets. We find no support in Section 367 for PG&E's position that the Commission may not legally determine the value of URG for ratemaking purposes until such time as market valuations are complete.

In addition, recent legislative actions confirm that market valuation is to be used only for the purpose of uneconomic cost recovery, not in determining a URG revenue requirement. ABX1-6 (Ch. 2, Stats. 2001, special session 1)⁴ eliminates market value as a factor influencing the ratemaking treatment for URG in the context of the continuing regulation as required by Section 377. As amended by ABX1-6, Section 377 provides that the URG assets continue under traditional Commission regulation until the Commission has authorized some other disposition of the assets pursuant to Section 851 and, in any event, at least until January 1, 2006. Section 377 does not authorize the market valuation procedure proposed by PG&E.

The amendments to Sections 216, 330 and 377 effected by ABX1-6 share a common characteristic. Each deletes reference to "market valuation" as one of the factors affecting the Commission's continued regulation URG. For example,

⁴ ABX1 6 filed with the Secretary of the State on January 18, 2001. An act to amend Sections 216, 330, and 377 of the Public Utilities Code, relating to public utilities, and declaring the urgency thereof, to take effect immediately.

in Section 216, the section that defines a public utility, ABX1-6 deleted in its entirety former subsection (h), which read as follows:

Generation assets owned by any public utility prior to January 1, 1997, and subject to rate regulation by the commission, shall continue to be subject to regulation by the commission until those assets have undergone market valuation in accordance with procedures established by the commission. (Emphasis added.)

Similarly, ABX1-6 deleted from Section 330(l)(2) the following language:

and utility generation should be transitioned from regulated status to unregulated status through means of commission-approved market valuation mechanisms. (Emphasis added.)

Both of these sections made market valuation a prerequisite to removal from Commission regulation, an outcome that is at odds with ratemaking for retained generation assets.

Section 330(l)(2), as amended, now provides simply: “Generation of electricity should be open to competition.”

Finally, ABX1-6 also modified Section 377. Prior to amendment by ABX1-6, the section read:

The commission shall continue to regulate the nonnuclear generating assets owned by any public utility prior to January 1, 1997, that are subject to commission regulation until those assets have been subject to market valuation in accordance with procedures established by the commission. If, after market valuation, the public utility wishes to retain ownership of nonnuclear generation assets in the same corporation as the distribution utility, the public utility shall demonstrate to the satisfaction of the commission, through a public hearing, that it would be consistent with the public interest and would not confer undue competitive advantage on

the public utility to retain that ownership in the same corporation as the distribution utility. (Emphasis added.)

As amended by ABX1-6 the section now reads:

The commission shall continue to regulate the facilities for the generation of electricity owned by any public utility prior to January 1, 1997, that are subject to commission regulation until the owner of those facilities has applied to the commission to dispose of those facilities and has been authorized by the commission under Section 851 to undertake that disposal. Notwithstanding any other provision of law, no facility for the generation of electricity owned by a public utility may be disposed of prior to January 1, 2006. The commission shall ensure that public utility generation assets remain dedicated to service for the benefit of California ratepayers.

In this phase of the rate stabilization proceeding (RSP), we are establishing a URG revenue requirement for PG&E on a prospective basis. PG&E's proposal raises issues dealing with sale of assets and uneconomic costs, issues which are unrelated to determining a prospective URG revenue requirement. Contrary to PG&E's position, the legislative amendments we discuss in this decision and the plain language of Section 367 lead us to conclude that market valuation of PG&E's non-nuclear assets is at odds with establishing a prospective URG revenue requirement.

Prior to amendments enacted by ABX 1-6, Section 367 provided for the market value of assets for the purpose determining uneconomic cost recovery. To the extent other sections of the Pub. Util. Code gave a role to market valuation in setting the utilities' prospective revenue requirements, AB X1-6 has amended the Pub. Util. Code to delete the references to market valuation. The only remaining relevant statutory references to market valuation occur in Section 367 and have nothing to do with setting a prospective URG revenue requirement.

Finally, PG&E asserts that ABX1-6 redefines the source of transition cost recovery for the utilities. The gist of PG&E's argument is that under the AB 1890 statutory framework, PG&E had an opportunity to recover its investment in generation facilities through sales of plant or power in an unregulated market. PG&E contends that ABX1-6 does not remove such opportunity but instead redefines the sources of transition cost recovery for the utilities.

Neither the plain language of ABX1-6 or its legislative history support PG&E's interpretation. Moreover, PG&E's interpretation would convert an "opportunity" to recover stranded assets into a "guarantee" by converting stranded costs into rate base.

We conclude that Section 367(b) does not require the Commission to establish a market valuation for PG&E's non-nuclear generation assets prior to determining a URG revenue requirement.

Transition Cost Balancing Account

We also address PG&E's efforts to recover undercollections in its Transition Cost Balancing Account (TCBA) in both its second and third scenarios. In scenario two, PG&E concludes that based on language in Decision (D.) 01-03-082, all unrecovered costs in the combined balances of the TCBA, Transition Revenue Account (TRA), Generation Asset Balancing Account (GABA), generation memorandum accounts and generation plant accounts constitute the amount to be recovered through ratemaking for PG&E's retained generation. Similar treatment for TCBA undercollections exists in PG&E's third scenario.

The theme inherent in PG&E's position is an entitlement, right or guarantee to recover all of its stranded costs. In this phase of the proceeding, we do not decide what past costs are recoverable or how they should be recovered.

We clarify that the focus of this proceeding is to determine prospective URG revenue requirements. To the extent that focus was not clear, we do not prejudge any of the issues PG&E raises concerning recovery of uneconomic costs or past costs remaining in balancing accounts. Contrary to PG&E's assertion, nothing in D.01-03-082 supports PG&E's suggestion that past uneconomic costs or costs not recovered during the rate freeze period must be recovered through prospective URG revenue requirements.

In D.01-03-082, we stated:

“To end the rate control mechanisms imposed by AB 1890 would require us to address the disposition of the balances in the Transition Cost Balancing Account (TCBA). We intend to monitor the balances remaining in the TCBA and will consider how to address remaining balances as we continue with these proceedings. We recognize that the magnitude of remaining balances may not have been contemplated in the AB 1890 cost recovery schemes. We will consider other approaches. For example, as we stated early in this decision, to the extent that generators and sellers make refunds for overcharges, those refunds should either be passed on to ratepayers or applied to capital cost recovery. In addition, legislative and negotiated changes relating to enhanced stranded cost recovery are now underway and may significantly affect the ultimate treatment and disposition of these costs. In this period of legislative re-examination of the premises and operation of AB 1890's restructuring statutes, it would be premature and unwise to opine as to the ultimate disposition and treatment of these accounts. We direct the utilities to maintain the regulatory accounting mechanisms as detailed below, but we explicitly draw no conclusions as to the ultimate treatment flowing from legislative or regulatory changes that could well involve the amounts tracked in those accounts. Indeed, as with so many aspects of AB 1890, the extent of the actual consequences of the legislation may well have been unintended and certainly

unforeseen by those supporting the AB 1890 stranded cost recovery constraints at the time.” (Slip op., p. 21-22.)

Contrary to D.01-03-082, PG&E assumes that the rate freeze has ended for two of its scenarios and consequently disposes of balances in the TCBA. As we stated in D.01-03-082, PG&E cannot unilaterally declare an end to the rate freeze. Moreover, we reject PG&E’s efforts to expand the limited scope of this proceeding to include a determination that the rate freeze has ended. When issues concerning the termination of the rate freeze are resolved, the Commission should address any impacts on URG revenue requirements. In the interim, though, we reject PG&E’s proposals which are premised on determinations concerning the end of the rate freeze. Our actions should not be viewed as prejudging PG&E’s positions, but rather a clear statement that the issues raised by PG&E go beyond what is necessary to determine a prospective URG revenue requirement.

In this interim decision, in the URG phase of the RSP, we reject PG&E’s market valuation proposal for its non-nuclear generation assets. We also reject PG&E’s proposal to recover undercollections in TCBA in its URG revenue requirement. In a future decision, we will resolve the remaining issues raised in this phase and address the remainder of PG&E’s proposed scenarios in more detail.

Proposed Decision

The ALJ’s proposed decision was issued on September 13, 2001. In matters that have gone to hearing, § 311(d) generally requires that the Commission issue its decision not sooner than 30 days after the proposed decision is filed and served.

The schedule adopted at the end of evidentiary hearing on July 31, 2001 provided for issuance of a proposed decision on September 25, 2001 and issuance of a Commission decision on October 25, 2001. The August 10 ACR advised parties that the Commission may need to take expeditious action on the legal issue of market valuation and also sought comment on whether parties would stipulate to waiver of the 30-day review and comment period prescribed by Section 311(d). Both PG&E and Edison decline to waive Section 311(d).

Comments on Proposed Decision

The proposed decision (PD) of the ALJ in this matter was mailed to the parties in accordance with Pub. Util. Code § 311(d) and Rule 77.2 of the Rules of Practice and Procedure. On October 3, 2001, comments on the PD were filed by Aglet, Cogeneration Association of California (CAC), ORA and PG&E. No replies to comments were electronically served by the October 9, 2001, 10:00 a.m. deadline set forth in ALJ Wong's September 17 response to PG&E's request for clarification.

Aglet states the PD but omits a detailed description of Aglet's position and it requests the addition of text describing its position in more detail. On page 7, prior to the header "Discussion," language is added describing Aglet's position.

CAC contends that the PD errs by interpreting California law to prohibit the recovery of sums in the TCBA unless and until the rate freeze is ended. CAC makes no specific reference to the PD to support this claim. Contrary, to CAC's assertion the PD purposefully does not address recovery of undercollections because such issues are unrelated to establishing a cost-based URG revenue requirement. Past undercollections have no direct connection to actual URG costs going forward.

Although CAC raises valid and important policy issues, such issues go beyond the scope of determining a cost-based URG revenue requirement. CAC's effort to raise issues separate from determining a URG revenue requirement is most evident in CAC's recommended edits to finding of fact number 7 which are as follows:

The focus of this proceeding is to determine prospective URG revenue requirements and to determine appropriate ratemaking to commence recovery of past uncollected balances, including unrecovered costs in the TCBA. (CAC's proposed text appears in underline.)

Issues concerning ratemaking for recovery of past uncollected balances are not directly related to establishing a cost-based URG revenue requirement, thus no error has occurred.

ORA finds no legal or factual errors in the PD. ORA agrees with the PD that dealing with past debts is not a pre-requisite to establishing a prospective revenue requirement.

However, ORA states that the PD does not indicate whether a need still exists to calculate stranded costs. ORA observes that the PD finds that the purpose of market valuation in Section 367 is to calculate stranded costs, and to perform the netting of above and below market costs. ORA seeks clarification on whether stranded costs still exist which justify market valuing PG&E's retained assets.

ORA believes that under ABX1-6, the requirement for utilities to retain their generating assets renders the net book value as the only logical basis for market value. Thus, ORA believes that cost-of-service ratemaking may render all generating assets economic, negating any need to market value PG&E's generating assets. ORA seeks clarification on whether net book value equals

market value under current conditions and also whether the Commission agrees that all generating assets are economic negating the need to market value PG&E's generation assets.

Although ORA states it finds no error in the PD, similar to CAC, it advocates for resolution of issues not directly related to establishing a cost-based URG revenue requirement. We agree with the sentiment ORA expresses in its testimony that valuation issues should be decided in a proceeding or phase explicitly designed to do so, where all parties have a clear understanding at the outset that valuation issues will be considered. We will not prejudge any valuation issues at this time unrelated to establishing a cost-based URG revenue requirement.

PG&E contends the PD commits legal error by determining PG&E's URG revenue requirement without reference to the market value of PG&E's URG assets. The impact of this alleged error is to deny PG&E the ability to recover an estimated \$4.1 billion in market value.

PG&E argues that a URG revenue requirement must be established with reference to the market value of PG&E's URG assets. PG&E believes that it is entitled to recover past uneconomic costs in its URG revenue requirement. The basis for this belief is that under AB 1X generation assets remain regulated. PG&E further states that once it credits TCBA with the market value of its economic URG, it is entitled to receive cash or an asset of equal value in order to recover the market value it has paid.

On the surface, PG&E's reference to the "market value it has paid" is confusing. PG&E's hydroelectric facilities, the assets over which the most controversy exists for PG&E, have not been recently bought by PG&E at "market value." PG&E later suggests in its comments that an entry made into the

Generation Balancing Account (GABA) entitles PG&E to recovery of the market value of its URG assets. PG&E argues that the PD is thus flawed because it adopts a “ratemaking approach” under which PG&E would not recover the market value it is entitled to and instead creates a write-off inconsistent with AB 1890 in general, and Pub. Util. Code § 367.

This phase of the RSP accomplishes the singular goal of determining the revenue requirements needed by the utilities to provide generation at cost based rates on a going forward basis. As the PD stated, this decision does not address issues concerning past uneconomic costs. By determining what actual costs are for providing generation on a going forward basis, the Commission is not passing judgment on the treatment or disposition of past uneconomic costs incurred by PG&E.

PG&E’ also contends that its approach for recovering past uneconomic costs in its URG revenue requirement is consistent with ABX1-6. PG&E also suggests that Section 367(b) confers a right upon the utilities to “recovery of their ‘uneconomic’ or ‘stranded’ costs [incurred] during the ratefreeze.” Assuming these statements to be true, however, there exists a variety of ratemaking approaches the Commission could adopt so that PG&E could recover its past uneconomic costs in the event the Commission finds that such recovery is warranted.

PG&E also states that the PD would force a write-off of the \$4.1 billion market value of PG&E’s retained generation assets, rather than allow the recovery of that amount. Thus, PG&E claims the PD results in an unconstitutional taking of PG&E’s property. Since this phase of the RSP does not address the recovery of uneconomic costs, PG&E’s claim of taking lacks merit.

We reiterate, in this phase of the RSP we do not determine the amount of uneconomic costs, if any, eligible for recovery or address how such costs should be recovered. To the extent we have interpreted ABX1-6, we have done so for the narrow purpose of addressing and dismissing PG&E's argument that the Commission is required by Section 367(b) to establish a market valuation for PG&E's generation assets prior to calculating a URG revenue requirement. We modify the PD to make clear that our interpretation of Section 367(b) responds only to PG&E's claim that the Commission is required to establish a market valuation for PG&E's URG assets prior to adopting a URG revenue requirement.

Findings of Fact

1. In this phase of the RSP, we are establishing a URG revenue requirement for PG&E on a prospective basis.
2. PG&E's market valuation proposal raises issues concerning recovery of uneconomic costs, issues which are unrelated to determining a prospective URG revenue requirement.
3. The focus of this phase of the RSP is to determine prospective URG revenue requirements.
4. When issues concerning the termination of the rate freeze are resolved, the Commission should address any impacts on URG revenue requirements.

Conclusions of Law

1. The Commission is not required by law to establish a market valuation for the generation assets of PG&E prior to establishing a URG revenue requirement.
2. D.01-03-082 does not require that PG&E's prospective URG revenue requirement include past uneconomic costs or costs not recovered during the rate freeze, including but not limited to unrecovered costs in the TCBA.

O R D E R

IT IS ORDERED that:

1. The proposal of Pacific Gas and Electric Company (PG&E) to market value its hydroelectric generation assets prior to establishing a utility retained generation (URG) revenue requirement is denied.

2. PG&E's proposal to include in its prospective URG revenue requirement past uneconomic costs or costs not recovered during the rate freeze, including but not limited to unrecovered costs in the Transition Cost Balancing Account, is denied.

This order is effective today.

Dated _____, at San Francisco, California.

APPENDIX A
******* SERVICE LIST *******
Last Update on 05-SEP-2001 by: SMJ
A0011038 LIST
A0011056/A0010028

******* APPEARANCES *******

Gerald Lahr
ABAG POWER
101 8TH STREET
OAKLAND CA 94607
(510) 464-7908
jerryl@abag.ca.gov
For: ASSOCIATION OF BAY AREA GOVERNMENTS (ABAG)

Katherine S. Poole
ADAMS BROADWELL JOSEPH & CARDOZO
651 GATEWAY BLVD., SUITE 900
SOUTH SAN FRANCISCO CA 94080
(650) 589-1660
kpoole@adamsbroadwell.com
For: The Coalition of California Utility Employees

Marc D. Joseph
Attorney At Law
ADAMS BROADWELL JOSEPH & CARDOZO
651 GATEWAY BOULEVARD, SUITE 900
SOUTH SAN FRANCISCO CA 94080
(650) 589-1660
mdjoseph@adamsbroadwell.com
For: The Coalition of California Utility Employees

William P. Adams
ADAMS ELECTRICAL SAFETY CONSULTING
716 BRETT AVENUE
ROHNERT PARK CA 94928-4012
(707) 795-7549
For: SELF

Aaron Thomas
AES NEWENERGY, INC.
350 S. GRAND AVENUE, SUITE 2950
LOS ANGELES CA 90071
(213) 996-6136
athomas@newenergy.com
For: New Energy Ventures, Inc.

Patrick McDonnell
AGLAND ENERGY
2000 NICASIO VALLEY ROAD
NICASIO CA 94946
(415) 662-6944
aglandenergy@earthlink.net
For: Enserch Energy Services

James Weil
AGLET CONSUMER ALLIANCE
PO BOX 1599
FORESTHILL CA 95631
(530) 367-3300
jweil@aglet.org
For: AGLET CONSUMER ALLIANCE

Michael Aguirre
Attorney At Law
AGUIRRE & MEYER
1060 8TH AVENUE, SUITE 300
SAN DIEGO CA 92101
(619) 235-8636
julesan@aol.com
For: RATEPAYERS/UCAN

Carrie H. Allen
Attorney At Law
AKIN, GUMP, STRAUSS, HAUER & FELD, LLP
1333 NEW HAMPSHIRE AVENUE, N.W., STE 400
WASHINGTON DC 20036
(202) 887-4530
callen@akingump.com
For: CE Generation

Donald Brookhyser
Attorney At Law
ALCANTAR & KAHL
1300 S.W. 5TH AVENUE, SUITE 1750
PORTLAND OR 97201
(503) 402-8702
deb@a-klaw.com
For: Cogeneration Association of California

Evelyn Kahl
Attorney At Law
ALCANTAR & KAHL, LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO CA 94104
(415) 421-4143
ek@a-klaw.com
For: Energy Producers & Users Coalition

Chris King
Executive Director
AMERICAN ENERGY INSTITUTE
842 OXFORD ST.
BERKELEY CA 94707
(510) 435-5189
ckingaei@yahoo.com

APPENDIX A
******* SERVICE LIST *******
Last Update on 05-SEP-2001 by: SMJ
A0011038 LIST
A0011056/A0010028

Edward G. Poole
Attorney At Law
ANDERSON & POOLE
601 CALIFORNIA STREET, SUITE 1300
SAN FRANCISCO CA 94108
(415) 956-6413
epoole@adplaw.com
For: California Independent Petroleum Association/Sun-Maid
Growers of California

Barbara R. Barkovich
BARKOVICH AND YAP, INC.
31 EUCALYPTUS LANE
SAN RAFAEL CA 94901
(415) 457-5537
brbarkovich@earthlink.net
For: California Large Energy Consumers Association (CLECA)

Reed V. Schmidt
BARTLE WELLS ASSOCIATES
1889 ALCATRAZ AVENUE
BERKELEY CA 94703
(510) 653-3399
rschmidt@bartlewells.com
For: California City County Streetlight Association (CAL-SLA)

Marco Gomez
Attorney At Law
BAY AREA RAPID TRANSIT DISTRICT
800 MADISON STREET, 5TH FLOOR
OAKLAND CA 94607
(510) 464-6058
mgomez1@bart.gov
For: Bay Area Rapid Transit District

Roger Berliner
BERLINER, CANDON & JIMISON
1225 19TH STREET, N.W., SUITE 800
WASHINGTON DC 20036
(202) 955-6067
rogerberliner@bcjlaw.com
For: Internal Services Department of Los Angeles County
(LACISD)

A Brubaker
BRUBAKER & ASSOCIATES, INC.
1215 FERN RIDGE PARKWAY, SUITE 208
ST. LOUIS MO 63141
(314) 275-7007

Jonathan M. Weisgall
V.P. Legislative & Regulatory Affairs
CALENERGY COMPANY, INC.
1200 NEW HAMPSHIRE AVE., NW, SUITE 300
WASHINGTON DC 20036
(202) 828-1378
jweisgall@aol.com

Jennifer Tachera
Attorney At Law
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-14
SACRAMENTO CA 95814-5504
(916) 654-3870
jtachera@energy.state.ca.us

Karen Norene Mills
Attorney At Law
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO CA 95833
(916) 561-5655
kmills@cbbf.com
For: California Farm Bureau Federation

Ronald Liebert
Attorney At Law
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO CA 95833
(916) 561-5657
rliebert@cbbf.com
For: California Farm Bureau Federation

Ed Yates
CALIFORNIA LEAGUE OF FOOD PROCESSORS
980 NINTH STREET, SUITE 230
SACRAMENTO CA 95814
(916) 444-9260
ed@clfp.com
For: California League of Food Processors

Lisa G. Urick
Attorney At Law
CALIFORNIA POWER EXCHANGE CORPORATION
200 S. LOS ROBLES AVENUE, SUITE 400
PASADENA CA 91101-2482
(626) 537-3328
lgurick@calpx.com

APPENDIX A
******* SERVICE LIST *******
Last Update on 05-SEP-2001 by: SMJ
A0011038 LIST
A0011056/A0010028

mbrubaker@consultbai.com
For: Brubaker & Associates, Inc.

For: CALIFORNIA POWER EXCHANGE

Robert Cagen
Attorney At Law
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO CA 94102
(415) 703-2197
rcc@cpuc.ca.gov
For: Office of Ratepayer Advocates

Tom Smegal
CALIFORNIA WATER SERVICE
1720 NORTH FIRST STREET
SAN JOSE CA 95112
(408) 367-8235
tsmegal@calwater.com
For: California Water Association

Jennifer Chamberlin
CHEVRON ENERGY SOLUTIONS
345 CALIFORNIA ST., 32ND FLOOR
SAN FRANCISCO CA 94104
(415) 733-4661
jnnc@chevron.com
For: Chevron Energy Solutions

Theresa Mueller
Deputy City Attorney
CITY AND COUNTY OF SAN FRANCISCO
1 DR. CARLTON B. GOODLETT PLACE
SAN FRANCISCO CA 94102
(415) 554-4640
theresa_mueller@ci.sf.ca.us
For: City & County of San Francisco

Bill Mc Callum
CITY OF FRESNO
5607 W. JENSEN AVENUE
FRESNO CA 93607
(559) 498-1728
bill.mccallum@ci.fresno.ca.us
For: CITY OF FRESNO

Frederick Ortlieb
Deputy City Attorney
CITY OF SAN DIEGO
1200 THIRD AVENUE, 11TH FLOOR
SAN DIEGO CA 92101

John Tooker
City Manager
CITY OF YUCAIPA
34272 YUCAIPA BLVD.
YUCAIPA CA 92399
(909) 797-2489

Howard Choy
Energy Management Division Manager
COUNTY OF LOS ANGELES
INTERNAL SERVICES DEPARTMENT
1100 NORTHEASTERN AVENUE
LOS ANGELES CA 90063
(323) 881-3939
hchoy@isd.co.la.ca.us
For: COUNTY OF LOS ANGELES

Patrick Mcguire
TOM BEACH
CROSSBORDER ENERGY
2560 NINTH STREET, SUITE 316
BERKELEY CA 94710
(510) 649-9790
patrickm@crossborderenergy.com
For: Watson Cogeneration Company

Tom Beach
CROSSBORDER ENERGY
2560 NINTH ST., SUITE 316
BERKELEY CA 94710
(510) 649-9790
tomb@crossborderenergy.com
For: Watson Cogeneration Company

Treg Tremont
Attorney At Law
DAVIS WRIGHT TREMAINE
ONE EMBARCADERO CENTER, SUITE 600
SAN FRANCISCO CA 94111-3834
(415) 276-6500
tregtremont@dwt.com
For: Costco Wholesale Corporation

Lindsey How-Downing
Attorney At Law
DAVIS WRIGHT TREMAINE LLP
ONE EMBARCADERO CENTER, STE 600

APPENDIX A
******* SERVICE LIST *******
Last Update on 05-SEP-2001 by: SMJ
A0011038 LIST
A0011056/A0010028

(619) 236-6220
fmo@sdcity.sannet.gov
For: CITY OF SAN DIEGO

SAN FRANCISCO CA 94111-3834
(415) 276-6512
lindseyhowdowning@dwt.com
For: CALPINE CORPORATION

Edward W. O'Neill
Attorney At Law
DAVIS WRIGHT TREMAINE, LLP
ONE EMBARCADERO CENTER, SUITE 600
SAN FRANCISCO CA 94111-3834
(415) 276-6500
edwardoneill@dwt.com
For: El Paso Natural Gas Company

Ron Knecht
ECONOMICS & TECH ANALYSIS GROUP
1465 MARLBAROUGH AVENUE
LOS ALTOS CA 94024-5742
(650) 968-0115
ronknecht@aol.com
For: SELF

Norman J. Furuta
Attorney At Law
DEPARTMENT OF THE NAVY
900 COMMODORE DRIVE, BLDG. 107
SAN BRUNO CA 94066-5006
(650) 244-2100
furutanj@efawest.navfac.navy.mil
For: Federal Executive Agencies

Lynn M. Haug
ANDY BROWN
Attorney At Law
ELLISON & SCHNEIDER
2015 H STREET
SACRAMENTO CA 95814-3109
(916) 447-2166
lmh@eslawfirm.com
For: East Bay Municipal Utility District (EBMUD)

Daniel W. Douglass
Attorney At Law
5959 TOPANGA CANYON BLVD., STE 244
WOODLAND HILLS CA 91367
(818) 596-2201
douglass@energyattorney.com
For: ALLIANCE OF RETAIL MARKETS and WESTERN
POWER TRADING FORUM

Andrew B. Brown
Attorney At Law
ELLISON, SCHNEIDER & HARRIS
2015 H STREET
SACRAMENTO CA 95814
(916) 447-2166
abb@eslawfirm.com
For: CALIFORNIA DEPARTMENT OF GENERAL SERVICES
(DGS)

Dan L. Carroll
Attorney At Law
DOWNEY BRAND SEYMOUR & ROHWER, LLP
555 CAPITOL MALL, 10TH FLOOR
SACRAMENTO CA 95814
(916) 441-0131
dcarroll@dbsr.com
For: CALIFORNIA INDUSTRIAL USERS

Douglas K. Kerner
Attorney At Law
ELLISON, SCHNEIDER & HARRIS
2015 H STREET
SACRAMENTO CA 95814
(916) 447-2166
dkk@eslawfirm.com
For: Independent Energy Producers Association

Colin L. Pearce
DUANE MORRIS & HECKSCHER
100 SPEAR STREET, SUITE 1500
SAN FRANCISCO CA 94105
(415) 371-2200
clpearce@duanemorris.com
For: Sacramento Municipal Utility District (SMUD)

Diane Fellman
Attorney At Law
ENERGY LAW GROUP LLP
1999 HARRISON STREET, SUITE 2700
OAKLAND CA 94612-3572
(415) 703-6000
difellman@energy-law-group.com
For: PacificCrockett Energy, Inc.

Thomas M. Berliner

APPENDIX A
******* SERVICE LIST *******
Last Update on 05-SEP-2001 by: SMJ
A0011038 LIST
A0011056/A0010028

Attorneys At Law
DUANE MORRIS & HECKSCHER
100 SPEAR STREET, SUITE 1500
SAN FRANCISCO CA 94105
(415) 371-2200
tmberliner@duanemorris.com
For: Sacramento Municipal Utility District

Carolyn Kehrein
ENERGY MANAGEMENT SERVICES
1505 DUNLAP COURT
DIXON CA 95620-4208
(707) 678-9586
cmkehrein@ems-ca.com
For: Energy Users Forum

Nancy Ryan
ENVIRONMENTAL DEFENSE
5655 COLLEGE AVENUE
OAKLAND CA 94618
(510) 658-8008
nryan@environmentaldefense.org
For: Environmental Defense

James D. Squeri
Attorney At Law
GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO CA 94111
(415) 392-7900
jsqueri@gmssr.com
For: California Retailers Association

Jeanne M. Bennett
Attorney At Law
GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO CA 94111
(415) 392-7900
jbennett@gmssr.com
For: Alliance for Retail Markets and Enron Corporation

Michael B. Day
Attorney At Law
GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO CA 94111-3133
(415) 392-7900
mday@gmssr.com
For: ENRON ENERGY SERVICES, INC., ENRON NORTH AMERICA

Andrew J. Skaff, Attorney at Law
ENERGY LAW GROUP, LLP
1999 HARRISON ST., SUITE 2700
OAKLAND CA 94612
(510) 874-4370
askaff@energy-law-group.com
For: New York Mercantile Exchange/Dynegy, Inc.

Kelly R. Tilton
GRUENEICH RESOURCE ADVOCATES
582 MARKET STREET, SUITE 1020
SAN FRANCISCO CA 94104-5305
(415) 834-2300
For: Sonoma County Water Agency

Kelly R. Tilton, Attorney at Law
GRUENEICH RESOURCE ADVOCATES
582 MARKET STREET, SUITE 1020
SAN FRANCISCO CA 94104
(415) 834-2300
ktilton@gralegal.com
For: University of California/California State University

Morten Henrik Greidung
HAFSLUND ENERGY TRADING, LLC
101 ELLIOT AVE., SUITE 510
SEATTLE WA 98119
(206) 436-0640
mhg@hetrading.com
For: HAFSLUND ENERGY TRADING, LLC

James Hodges
4720 BRAND WAY
SACRAMENTO CA 95819
(916) 451-7011
hodgesjl@pacbell.net
For: TELACU and Maravilla Foundation

Jan Smutny-Jones Association
INDEPENDENT ENERGY PRODUCERS
1112 I STREET, STE. 380
SACRAMENTO CA 95814-2896
(916) 448-9499
smutny@iepa.com

William B. Marcus
JBS ENERGY, INC.
311 D STREET, SUITE A
WEST SACRAMENTO CA 95605
(916) 372-0534
bill@jbs.com

APPENDIX A
******* SERVICE LIST *******
Last Update on 05-SEP-2001 by: SMJ
A0011038 LIST
A0011056/A0010028

Richard H. Counihan
GREENMOUNTAIN.COM
50 CALIFORNIA STREET, SUITE 1500
SAN FRANCISCO CA 94111
(415) 439-5310
rick.counihan@greenmountain.com
For: GREEN MOUNTAIN ENERGY RESOURCES

Bill Bishop
JR. WOOD, INC.
PO BOX 545
ATWATER CA 95301
(209) 358-5643
bishop@jrwood.com
For: Jr. Wood, Inc. and Manufacturers Council of the Central Valley (MCCV)

Kathleen Kiernan-Harrington
JAMES WEIL
SUITE 200
720 MARKET STREET
SAN FRANCISCO CA 94102
(415) 781-5348
harrington@ggra.org
For: GOLDEN GATE RESTAURANT ASSOCIATION

Daniel L. Rial
KINDER MORGAN ENERGY PARTNERS
1100 TOWN & COUNTRY ROAD
ORANGE CA 92868
(714) 560-4854
riald@kindermorgan.com
For: Kinder Morgan Energy Partners, SFPP, L.P., CALNEV

Thomas S. Knox
Attorney At Law
KNOX, LEMMON & ANAPOCKSKY, LLP
ONE CAPITOL MALL, SUITE 700
SACRAMENTO CA 95814
(916) 498-9911
tknox@klalawfirm.com
For: Leprino Foods

Susan E. Brown
Attorney At Law
LATINO ISSUES FORUM
785 MARKET STREET, 3RD FLOOR
SAN FRANCISCO CA 94103-2003
(415) 284-7224

For: TURN (EXPERT WITNESS)

Norman A. Pedersen, Esquire
JONES DAY REAVES & POGUE
555 WEST FIFTH STREET, SUITE 4600
LOS ANGELES CA 90013-1025
(213) 243-2810
napedersen@jonesday.com
For: Commonwealth Energy Corporation and Automated Power Exchange Inc. & Frito Lay, Inc.

William H. Booth
Attorney At Law
LAW OFFICES OF WILLIAM H. BOOTH
1500 NEWELL AVENUE, 5TH FLOOR
WALNUT CREEK CA 94596
(925) 296-2460
wbooth@booth-law.com
For: California Large Energy Consumers Assn.

Christopher A. Hilén
Attorney At Law
LEBOEUF LAMB GREENE & MACRAE LLP
ONE EMBARCADERO CENTER, SUITE 400
SAN FRANCISCO CA 94111
(415) 951-1141
chilen@llgm.com
For: RELIANT ENERGY POWER GENERATION, INC.

John W. Leslie
Attorney At Law
LUCE FORWARD HAMILTON & SCRIPPS, LLP
600 WEST BROADWAY, SUITE 2600
SAN DIEGO CA 92101-3391
(619) 236-1414
jleslie@luce.com
For: SHELL ENERGY SERVICES, LLC

Steven Moss
M.CUBED
673 KANSAS STREET
SAN FRANCISCO CA 94107
(415) 643-9578
smoss@hooked.net
For: WESTERN MOBILHOME PARK ASSOCIATION

David Huard
RANDALL KEEN
MANATT, PHELPS & PHILLIPS
11355 W. OLYMPIC BLVD
LOS ANGELES CA 90064
(310) 312-4247

APPENDIX A
******* SERVICE LIST *******
Last Update on 05-SEP-2001 by: SMJ
A0011038 LIST
A0011056/A0010028

lifcentral@lif.org
For: LATINO ISSUES FORUM

C. Susie Berlin
Attorney At Law
LAW OFFICES OF BARRY F. MC CARTHY
2105 HAMILTON AVENUE, SUITE 140
SAN JOSE CA 95125
(408) 558-0950
sberlin@mccarthyllaw.com
For: NORTHERN CALIFORNIA POWER AGENCY

David J. Byers
Attorney At Law
MCCRACKEN, BYERS & HAESLOOP
840 MALCOLM ROAD, SUITE 100
BURLINGAME CA 94010
(650) 259-5979
btenney@landuselaw.com
For: California City County Streetlight Association (CAL-SLA)

Terry J. Houlihan
Attorney At Law
MCCUTCHEN DOYLE BROWN & ENERSEN LLP
3 EMBARCADERO CENTER, 18TH FLOOR
SAN FRANCISCO CA 94111
(415) 393-2000
thoulihan@mdbe.com
For: RELIANT ENERGY POWER GENERATION, INC.

Patricia R. Williams
MERVYN'S CALIFORNIA
22301 FOOTHILL BOULEVARD
HAYWARD CA 94541
(510) 727-5905
pat.williams@dhe.com
For: Mervyn's/Target Stores Division of Dayton Hudson Corporation

Jeffrey H. Goldfien
Assistant City Attorney
MEYERS, NAVE, RIBACK, SILVER & WILSON
777 DAVIS STREET, SUITE 300
SAN LEANDRO CA 94577
(510) 351-4300
jhg@meyersnave.com
For: City of San Leandro

Christopher W. Reardon
MFRS COUNCIL OF THE CENTRAL VALLEY
PO BOX 1564

dhuard@manatt.com
For: CALIFORNIA HEALTHCARE ASSOCIATION

Matthew V. Brady
Attorney At Law
MATTHEW V. BRADY & ASSOCIATES
300 CAPITOL MALL, SUITE 1100
SACRAMENTO CA 95814
(916) 442-5600
bradylaw@pacbell.net
For: Shasta Hydroelectric, Inc.

Scott T. Steffen
Attorney At Law
MODESTO IRRIGATION DISTRICT
1231 ELEVENTH STREET
MODESTO CA 95354
(209) 526-7387
scottst@mid.org
For: MODESTO IRRIGATION DISTRICT (MID)

Diane E. Pritchard
Attorney At Law
MORRISON & FOERSTER, LLP
425 MARKET STREET
SAN FRANCISCO CA 94105-2482
(415) 268-7188
dpritchard@mofo.com
For: E&J Gallo Winery, The Wine Institute and the Agricultural Energy Consumers Association.

Peter Hanschen
Attorney At Law
MORRISON & FOERSTER, LLP
425 MARKET STREET
SAN FRANCISCO CA 94105
(415) 268-7214
phanschen@mofo.com
For: Agricultural Energy Consumers Assn.

Sara Steck Myers
Attorney At Law
122 28TH AVENUE
SAN FRANCISCO CA 94121
(415) 387-1904
ssmyers@worldnet.att.net
For: CENTER FOR ENERGY EFFICIENCY AND RENEWABLE TECHNOLOGIES (CEERT)

Richard Roos-Collins, Attorney at Law
NATURAL HERITAGE INSTITUTE

APPENDIX A
******* SERVICE LIST *******
Last Update on 05-SEP-2001 by: SMJ
A0011038 LIST
A0011056/A0010028

MODESTO CA 95353
(209) 523-0886
cwrnccv@worldnet.att.net
For: Manufacturers Council of the Central Valley (MCCV)

Kevin R. Mcspadden
Attorney At Law
MILBANK TWEED HADLEY & MCCLOY
601 SOUTH FIGUEROA, 30TH FLOOR
LOS ANGELES CA 90017
(213) 892-4563
kmcs padd@milbank.com
For: MILBANK, TWEED, HADLEY & MC CLOY

Jose E. Guzman, Jr.
Attorney At Law
NOSSAMAN GUTHNER KNOX & ELLIOTT LLP
50 CALIFORNIA STREET, 34TH FLOOR
SAN FRANCISCO CA 94111-4799
(415) 398-3600
jguzman@nossaman.com
For: Cargill Corporation

Christine Ferrari
Deputy City Attorney
OFFICE OF THE CITY ATTORNEY
CITY HALL ROOM 234
1 DR. CARLTON B. GOODLETT PLACE
SAN FRANCISCO CA 94102-4682
(415) 554-4634
christine_ferrari@ci.sf.ca.us

Joseph M. Malkin
Attorney At Law
ORRICK, HERRINGTON & SUTCLIFFE LLP
400 SANSOME STREET
SAN FRANCISCO CA 94111-3143
(415) 773-5505
jmalkin@orrick.com
For: THE AES CORPORATION

William H. Edwards
KELLY M. MORTON, JAMES L. LOPES
PACIFIC GAS AND ELECTRIC CO.
77 BEALE STREET
PO BOX 7442, RM 3115-B30A
SAN FRANCISCO CA 94120-7442
(415) 973-2768
whe1@pge.com
For: PG&E

2140 SHATTUCK AVENUE, SUITE 500
BERKELEY CA 94704-1222
(510) 644-2900
rrcollins@n-h-i.org
For: California Hydropower Reform Coalition

Janie Mollon
Manager Regulatory Affairs
NEW WEST ENERGY
PO BOX 61868
PHOENIX AZ 85082-1868
(602) 629-7758
jsmollon@newwestenergy.com
For: NEW WEST ENERGY

Lon W. House
RCRC ENERGY ADVISOR
4901 FLYING C ROAD
CAMERON PARK CA 95682
(530) 676-8956
lwhouse@el-dorado.ca.us
For: Regional Council of Rural Counties

Don Schoenbeck
RCS CONSULTING, INC.
900 WASHINGTON STREET, SUITE 1000
VANCOUVER WA 98660
(360) 737-3877
dws@keywaycorp.com
For: Coalinga Cogenerator

James Ross, RCS CONSULTING, INC.
RCS CONSULTING, INC.
500 CHESTERFIELD CENTER, SUITE 320
CHESTERFIELD MO 63017
(636) 530-9544
jimross@r-c-s-inc.com
For: Midway Sunset Cogeneration

Steven Greenberg, REALENERGY
300 CAPITOL MALL, SUITE 300
SACRAMENTO CA 95814
(916) 325-2500
sgreenberg@realenergy.com
For: RealEnergy

Keith Sappenfield
RELIANT ENERGY RETAIL, INC.
PO BOX 1409
HOUSTON TX 77251-1409
(713) 207-5570
keith-sappenfield@reliantenergy.com

APPENDIX A
******* SERVICE LIST *******
Last Update on 05-SEP-2001 by: SMJ
A0011038 LIST
A0011056/A0010028

Peter Ouborg
Attorney At Law
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET
SAN FRANCISCO CA 94106
(415) 973-2286
pxo2@pge.com
For: Pacific Gas and Electric Company

Patrick J. Power
Attorney At Law
1300 CLAY STREET, SUITE 600
OAKLAND CA 94612
(510) 446-7742
pjpowerlaw@aol.com
For: City of Long Beach; Universal Studios Inc.

Dana S. Appling
General Counsel
SACRAMENTO MUNICIPAL UTILITY DISTRICT
LEGAL DEPARTMENT MSB406
PO BOX 15830
SACRAMENTO CA 95852-1830
(916) 732-6126

Phillip J. Muller
SCD ENERGY SOLUTIONS
436 NOVA ALBION WAY
SAN RAFAEL CA 94903
(415) 479-1710
pjmuller@ricochet.net
For: Southern Company Energy Marketing

Jeffrey M. Parrott
LYNN G. VAN WAGENEN
Attorney At Law
SEMPRA ENERGY
101 ASH STREET
SAN DIEGO CA 92101-3017
(619) 699-5063
jparrott@sempra.com
For: San Diego Gas & Electric Company

Judy Young
Attorney At Law
SEMPRA ENERGY
555 W. 5TH STREET, M.L.G.T. 14E7
LOS ANGELES CA 90013
(213) 244-2955
jlyoung@sempra.com
For: Southern California Gas Company

For: Reliant Energy Retail, Inc.

Randy Britt, ROBINSONS-MAY
6160 LAUREL CANYON BLVD.
NORTH HOLLYWOOD CA 91606
(818) 509-4777
randy_britt@mayco.com
For: Robinsons-May

Arlin Orchard, Attorney at Law
SACRAMENTO MUNICIPAL UTILITY DISTRICT
PO BOX 15830, MAIL STOP-B406
SACRAMENTO CA 95852-1830
(916) 732-5830
aorchard@smud.org
For: Sacramento Municipal Utility District

Justin D. Bradley
SILICON VALLEY MANUFACTURING GROUP
226 AIRPORT PARKWAY, SUITE 190
SAN JOSE CA 95110
(408) 501-7852
jbradley@svmg.org
For: Silicon Valley Manufacturing Group

Beth A. Fox
Attorney At Law
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD CA 91770
(626) 302-6897
beth.fox@sce.com
For: SOUTHERN CALIFORNIA EDISON COMPANY (SCE)

James P. Shotwell
Attorney At Law
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVE., ROOM 337
ROSEMEAD CA 91770-0001
(626) 302-4531
j.p.shotwell@sce.com
For: SOUTHERN CALIFORNIA EDISON COMPANY (SCE)

James C. Paine
Attorney At Law
STOEL RIVES LLP
900 S.W. FIFTH AVENUE, STE 2600
PORTLAND OR 97204-1268
(503) 294-9246
jcaine@stoel.com
For: PacifiCorp

APPENDIX A
******* SERVICE LIST *******
Last Update on 05-SEP-2001 by: SMJ
A0011038 LIST
A0011056/A0010028

Keith W. Melville
DAVID R. CLARK
Attorney At Law
SEMPRA ENERGY
101 ASH STREET
SAN DIEGO CA 92101-3017
(619) 699-5039
kmelville@sempira.com
For: San Diego Gas & Electric Company

Andrew Chau
Attorney At Law
SHELL ENERGY SERVICES COMPANY, L.L.C.
1221 LAMAR STREET, SUITE 1000
HOUSTON TX 77010
(713) 241-8939
anchau@shellus.com

Itzel Iberrio
THE GREENLINING INSTITUTE
785 MARKET STREET, 3RD FLOOR
SAN FRANCISCO CA 94103-2003
(415) 284-7202
iberrio@greenlining.org
For: THE GREENLINING INSTITUTE

Denis George
Energy Manager
THE KROGER COMPANY
1014 VINE STREET
CINCINNATI OH 45202
(513) 762-4538
dgeorge@kroger.com
For: The Kroger Company

Peter Bray
THE NEW POWER COMPANY
101 CALIFORNIA STREET, SUITE 1950
SAN FRANCISCO CA 94111
(415) 782-7810
pbray@newpower.com
For: The New Power Company

Matthew Freedman
Attorney At Law
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO CA 94102
(415) 929-8876 EX314
freedman@turn.org
For: The Utility Reform Network (TURN)

James Bushee
SUTHERLAND, ASBILL & BRENNAN
1275 PENNSYLVANIA AVENUE
WASHINGTON DC 20004
(202) 383-0100
jbushee@sablav.com
For: CALIFORNIA MANUFACTURERS ASSOCIATION (CMA)

Keith Mc Crea
Attorney At Law
SUTHERLAND, ASBILL & BRENNAN LLC
1275 PENNSYLVANIA AVENUE, N.W.
WASHINGTON DC 20004-2415
(202) 383-0705
kmccrea@sablav.com
For: CALIFORNIA MANUFACTURERS & TECHNOLOGY
ASSN.

Bernardo R. Garcia
UTILITY WORKERS UNION OF AMERICA, AFL-CIO
PO BOX 5198
OCEANSIDE CA 92052-5198
(949) 369-9936
uwuaregion5@earthlink.net
For: Utility Workers Union of America, AFL-CIO

Jerry Bloom
MARGARET ROSTKER (EMAIL: ROSTKMA@LAWWHITE
Attorney At Law
WHITE & CASE
TWO EMBARCADERO CENTER, SUITE 650
SAN FRANCISCO CA 94111
(415) 544-1104
bloomje@la.whitecase.com
For: California Cogeneration Council

Jason J. Zeller
Legal Division
RM. 5002
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-4673
jjz@cpuc.ca.gov
For: Office of Ratepayer Advocates

******* STATE EMPLOYEE *******

Truman L. Burns
Office of Ratepayer Advocates
RM. 4209
505 VAN NESS AVE

APPENDIX A
******* SERVICE LIST *******
Last Update on 05-SEP-2001 by: SMJ
A0011038 LIST
A0011056/A0010028

Robert Finkelstein
Attorney At Law
THE UTILITY REFORM NETWORK
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO CA 94102
(415) 929-8876 X-301
bfinkelstein@turn.org
For: The Utility Reform Network (TURN)

Michael Shames
Attorney At Law
UTILITY CONSUMERS' ACTION NETWORK
1717 KETTNER BLVD., SUITE 105
SAN DIEGO CA 92101-2532
(619) 696-6966
mshames@ucan.org
For: Utility Consumers' Action Network (UCAN)

Monica Schwebs
Attorney At Law
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS-14
SACRAMENTO CA 95814-5512
(916) 654-5207
mschwebs@energy.state.ca.us

Robert Pernell
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET
SACRAMENTO CA 95829
(916) 654-5036
rpernell@energy.state.ca.us
For: CALIFORNIA ENERGY COMMISSION (CEC)

Ruben Tavares
Electricity Analysis Office
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS 20
SACRAMENTO CA 95814
(916) 654-5171
rtavares@energy.state.ca.us
For: California Energy Commission

Angela Minkin
Administrative Law Judge
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE, ROOM 5116
SAN FRANCISCO CA 94102
a0011038@cpuc.ca.gov

San Francisco CA 94102
(415) 703-2932
txb@cpuc.ca.gov
For: OFFICE OF RATEPAYER ADVOCATES

Michael W. Neville, Attorney At Law
CALIFORNIA ATTORNEY GENERAL'S OFFICE
455 GOLDEN GATE AVENUE, SUITE 11000
SAN FRANCISCO CA 94102-7004
(415) 703-5523
michael.neville@doj.ca.gov
For: CALIFORNIA RESOURCES AGENCY

Michael Jaske
Chief Forecaster
CALIFORNIA ENERGY COMMISSION
1516 9TH STREET, MS-22
SACRAMENTO CA 95814
(916) 654-4777
mjaske@energy.state.ca.us

Jim O'Brien
DEPARTMENT OF WATER RESOURCES
1416 9TH STREET, ROOM 1118
SACRAMENTO CA 94236
(916) 653-8816
dwrlegal1@water.ca.gov
For: Department of Water Resources

Robert Miyashiro
DEPT. OF FINANCE
STATE CAPITOL, RM 1145
SACRAMENTO CA 95814
(916) 445-8610
firmiyas@dof.ca.gov
For: DEPT. OF FINANCE (DOF)

Christopher Danforth
Office of Ratepayer Advocates
RM. 4101
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1481
ctd@cpuc.ca.gov
For: Office of Ratepayer Advocates

Joseph R. DeUlloa
Administrative Law Judge Division
RM. 5105
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-3124

APPENDIX A
******* SERVICE LIST *******
Last Update on 05-SEP-2001 by: SMJ
A0011038 LIST
A0011056/A0010028

For: cpuc

jrd@cpuc.ca.gov

Roderick A. Campbell
Office Of Governmental Affairs
CALIFORNIA PUBLIC UTILITIES COMMISSION
770 L STREET, STE 1050
SACRAMENTO CA 95814
(916) 327-1418
rax@cpuc.ca.gov

Pamela Durgin
Energy Division
RM. 4-A
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1124
pmd@cpuc.ca.gov

Sean F. Casey
Office of Ratepayer Advocates
RM. 4205
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1667
sfc@cpuc.ca.gov
For: Office of Ratepayer Advocates

Robert T. Feraru
Public Advisor Office
RM. 5303
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2074
rtf@cpuc.ca.gov
For: Public Advisor's Office

Faline Fua
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2481
fua@cpuc.ca.gov

Laura L. Krannawitter
Executive Division
RM. 5210
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2538
llk@cpuc.ca.gov

Julie Halligan
Executive Division
RM. 5215
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-3491
jmh@cpuc.ca.gov

Donald J. Lafrenz
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1063
dlf@cpuc.ca.gov
For: Energy Division

Audra Hartmann
Executive Division
770 L STREET, SUITE 1050
Sacramento CA 95814
(916) 327-1417
ath@cpuc.ca.gov

Steve Linsey
Office of Ratepayer Advocates
RM. 4101
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1341
car@cpuc.ca.gov
For: Office of Ratepayer Advocates

Kayode Kajopaiye
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2557

Kimberly Lippi
Legal Division
RM. 4107

APPENDIX A
******* SERVICE LIST *******
Last Update on 05-SEP-2001 by: SMJ
A0011038 LIST
A0011056/A0010028

kok@cpuc.ca.gov
For: Energy Division

Dexter E. Khoury
Office of Ratepayer Advocates
RM. 4205
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1200
bsl@cpuc.ca.gov
For: Office of Ratepayer Advocates

Robert Kinosian
Office of Ratepayer Advocates
RM. 4209
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1500
gig@cpuc.ca.gov
For: Office of Ratepayer Advocates

Anne W. Premo
Energy Division, AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1247
awp@cpuc.ca.gov
For: CPUC ENERGY DIVISION

Thomas R. Pulsifer
Administrative Law Judge Division
505 VAN NESS AVE, RM. 5005
San Francisco CA 94102
(415) 703-2386
trp@cpuc.ca.gov

Steve Roscow
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1189
scr@cpuc.ca.gov

Steven C Ross
Office of Ratepayer Advocates
RM. 4102
505 VAN NESS AVE

505 VAN NESS AVE
San Francisco CA 94102
(415) 703-5822
kjl@cpuc.ca.gov

Jeanette Lo
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1825
jlo@cpuc.ca.gov
For: Energy Division

Kim Malcolm
Executive Division
RM. 5115
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1926
kim@cpuc.ca.gov

Zenaida G. Tapawan-Conway
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2624
ztc@cpuc.ca.gov

Maria Vanko
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2818
mv1@cpuc.ca.gov
For: Energy Division

Christine M. Walwyn
Administrative Law Judge Division
RM. 5101
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2301
cmw@cpuc.ca.gov

Rosalina White
Public Advisor Office

APPENDIX A
******* SERVICE LIST *******
Last Update on 05-SEP-2001 by: SMJ
A0011038 LIST
A0011056/A0010028

San Francisco CA 94102
(415) 703-2140
sro@cpuc.ca.gov

Randy Chinn
SENATE ENERGY COMMITTEE
ROMM 408
STATE CAPITOL
SACRAMENTO CA 95814
randy.chinn@senate.ca.gov

Linda Serizawa
Executive Division
RM. 5119
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1383
lss@cpuc.ca.gov

Maria E. Stevens
Executive Division
RM. 500
320 WEST 4TH STREET SUITE 500
Los Angeles CA 90013
(213) 576-7012
mer@cpuc.ca.gov

Tom O'Neill, Vice President
ABN AMRO INCORPORATED
EQUITY RESEARCH
ONE CALIFORNIA STREET, SUITE 200
SAN FRANCISCO CA 94111
(415) 983-2901
tom.oneill@abnamro.com

David Marcus
ADAMS BROADWELL & JOSEPH
PO BOX 1287
BERKELEY CA 94701-1287
(510) 528-0728
dmarcus@slip.net
For: Coalition of California Utility Employees

Michael Alcantar, Attorney At Law
ALCANTAR & KAHL LLP
120 MONTGOMERY STREET, SUITE 2200
SAN FRANCISCO CA 94104
mpa@a-klaw.com

Ira Schoenholtz, President
President
AMERICAN ASSN OF BUSINESS PERSONS W/DIS

RM. 5303
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2074
raw@cpuc.ca.gov

John S. Wong
Administrative Law Judge Division
RM. 5019
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-3130
jsw@cpuc.ca.gov

Helen W. Yee
Legal Division
RM. 5031
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2474
yee@cpuc.ca.gov

******* INFORMATION ONLY *******

Ed Cazalet
AUTOMATED POWER EXCHANGE, INC.
5201 GREAT AMERICA PARKWAY
SANTA CLARA CA 95054
(408) 517-2900
ed@apx.com
For: Automated Power Exchange, Inc.

Scott Blaising
Attorney At Law
8980 MOONEY ROAD
ELK GROVE CA 95624
(916) 682-9702
blaising@braunlegal.com

Paul A. Harris
BRIDGE NEWS
44 MONTGOMERY, SUITE 2410
SAN FRANCISCO CA 94104
(415) 835-7641
paul.harris@bridge.com
For: BRIDGE NEWS

Mona Patel
BROWN & WOOD LLP

APPENDIX A
******* SERVICE LIST *******
Last Update on 05-SEP-2001 by: SMJ
A0011038 LIST
A0011056/A0010028

2 WOODHOLLOW
IRVINE CA 92604-3229
(949) 559-1516
For: American Association of Business Persons with Disabilities

Frank Annunziato, President
President
AMERICAN UTILITY NETWORK INC.
1746 N VALLEJO WAY
UPLAND CA 91784
(909) 989-4000
ROTT1@aol.com

Edward G. Poole, Attorney at Law
ANDERSON & POOLE
601 CALIFORNIA STREET, SUITE 1300
SAN FRANCISCO CA 94108
(415) 956-6413
epoole@adplaw.com
For: INDEPENDENT OIL PRODUCERS AGENCY (IOPA)

Robert E. Anderson
APS ENERGY SERVICES
1500 FIRST AVENUE
ROCHESTER MN 55906
(507) 289-0800
bob_anderson@apses.com
For: APS ENERGY SERVICES

William Dombrowski
CALIFORNIA RETAILERS ASSOCIATION
980 9TH STREET, SUITE 2100
SACRAMENTO CA 95814-2741
(916) 443-1975

Alexandre B. Makler
CALPINE CORPORATION
6700 KOLL CENTER PARKWAY, SUITE 200
PLEASANTON CA 94566
(925) 600-2081
alexm@calpine.com
For: CALPINE CORPORATION

Susannah Churchill
Energy Advocate
CALPIRG
926 J ST. 523
SACRAMENTO CA 95814
(916) 448-4516
swchurchill@juno.com
For: CALPIRG

555 CALIFORNIA STREET, 50TH FLOOR
SAN FRANCISCO CA 94104
(415) 772-1265
mpatel@brownwoodlaw.com

Stephen Layman
CALIFORNIA ENERGY COMMISSION, EIAD
1516 9TH STREET, MS-20
SACRAMENTO CA 95814
(916) 654-4845
Slayman@energy.state.ca.us

Derk Pippin
CALIFORNIA ENERGY MARKETS
9 ROSCOE STREET
SAN FRANCISCO CA 94110-5921
(415) 824-3222
derkp@newsdata.com
For: CALIFORNIA ENERGY MARKETS (CEM)

J. A. Savage
CALIFORNIA ENERGY MARKETS
3006 SHEFFIELD AVENUE
OAKLAND CA 94602-1545
(510) 534-9109
honest@compuserve.com
For: California Energy Markets

June M. Skillman
COMPLETE ENERGY SERVICES, INC.
650 E. PARKRIDGE AVENUE, UNIT 110
CORONA CA 92879
(909) 280-9411
jskillman@prodigy.net

Carl K. Oshiro
Attorney At Law
CSBRT/CSBA
100 FIRST STREET, SUITE 2540
SAN FRANCISCO CA 94105
(415) 927-0158
oshirock@pacbell.net
For: CALIFORNIA SMALL BUSINESS ASSOCIATION AND
CALIFORNIA SMALL BUSINESS ROUNDTABLE

Nicole A. Tutt
DUANE MORRIS & HECKSCHER
100 SPEAR STREET, SUITE 1500
SAN FRANCISCO CA 94105
(415) 371-2200
natutt@duanemorris.com

APPENDIX A
******* SERVICE LIST *******
Last Update on 05-SEP-2001 by: SMJ
A0011038 LIST
A0011056/A0010028

Kevin Duggan
CAPSTONE TURBINE CORPORATION
21211 NORDHOFF STREET
CHATSWORTH CA 91311
(818) 734-5455
kduggan@capstoneturbine.com

Douglas L. Anderson
Vice President And General Counsel
CE GENERATION, LLC
302 SOUTH 36TH STREET, SUITE 400
OMAHA NE 68131
(402) 231-1642
doug.anderson@calenergy.com

John A. Barthrop
General Counsel
COMMONWEALTH ENERGY CORP.
15991 RED HILL AVENUE, NO. 201
TUSTIN CA 92780
(714) 258-0470
jbarthrop@powersavers.com
For: Commonwealth Energy Corp.

Angela Oh
Advisor
COMMUNITY TECHNOLOGY POLICY COUNCIL
PMB 7000-639
REDONDO BEACH CA 90277

Jon S. Silva
Government Affairs Associate
EDISON SOURCE
955 OVERLAND COURT
SAN DIMAS CA 91773
(909) 450-6035

Susan A. Huse
Research Analyst
EES CONSULTING, INC.
12011 BEL-RED ROAD, SUITE 200
BELLEVUE WA 98005-2471
(425) 452-9200
huse@eesconsulting.com

Jeffrey D. Harris
Attorney At Law
ELLISON & SCHNEIDER
2015 H STREET
SACRAMENTO CA 95814-3105
(916) 447-2166

Joseph M. Paul
DYNEGY MARKETING & TRADE
5976 WEST LAS POSITAS BLVD., STE. 200
PLEASANTON CA 94588
(925) 469-2314
joe.paul@dynegy.com

Gregory T. Blue
Manager, State Regulatory Affairs
DYNEGY, INC.
5976 W. LAS POSITAS BLVD., STE. 200
PLEASANTON CA 94588
(925) 469-2355
gtbl@dynegy.com
For: Dynegy, Inc.

Joseph A. Young
EAST BAY MUNICIPAL UTILITY DISTRICT
PO BOX 24055
OAKLAND CA 94623-1055
(510) 287-0147
joeyoung@ebmud.com

Wendy Illingworth
ECONOMIC INSIGHTS
320 FEATHER LANE
SANTA CRUZ CA 95060
(831) 427-2163
wendy@econinsights.com

Douglas E. Davie
HENWOOD ENERGY SERVICES, INC.
2710 GATEWAY OAKS DRIVE, STE. 300 NORTH
SACRAMENTO CA 95833
(916) 569-0985
ddavie@hesinet.com

Jeffrey D. Schlichting
HMH RESOURCES, INC.
100 LARKSPUR LANDING, SUITE 213
LARKSPUR CA 94939
(415) 289-4080
jeff@hmhresources.com

Miriam Maxian
J.P. MORGAN SECURITIES, INC.
101 CALIFORNIA STREET, 37TH FLOOR
SAN FRANCISCO CA 94111
(415) 954-3297
maxian_miriam@jpmorgan.com

APPENDIX A
******* SERVICE LIST *******
Last Update on 05-SEP-2001 by: SMJ
A0011038 LIST
A0011056/A0010028

jdheslawfirm.com
For: Sacramento Municipal Utility District

James Meyn
Senior Structure Power Representative
ENGAGE ENERGY US, L.P.
8880 RIO SAN DIEGO DRIVE
SAN DIEGO CA 92108-1634
(619) 702-9501

Gary B. Ackerman
FOOTHILL SERVICES, INC.
340 AUGUST CIRCLE
MENLO PARK CA 94025
foothill@lmi.net
For: Western Power Trading Forum

Robert D. Schasel
FRITO-LAY, INC.
7701 LEGACY DRIVE (4C-101)
PLANO TX 75024-4099
(972) 334-7000
robert.d.schasel@fritolay.com

H. Bradley Donovan
Senior Vice President
GEORGE WEISS ASSOCIATES, INC.
660 MADISON AVENUE, 16TH FLOOR
NEW YORK NY 10021-8405
(212) 415-4567
hbd@gweiss.com

Candace A. Younger
MANATT, PHELPS & PHILLIPS, LLP
11355 WEST OLYMPIC BOULEVARD
LOS ANGELES CA 90064
(310) 312-4000
cyounger@manatt.com

Randall W. Keen
MANATT, PHELPS & PHILLIPS, LLP
11355 WEST OLYMPIC BLVD.
LOS ANGELES CA 90064
(310) 312-4000
rkeen@manatt.com

Linda R. Beck
MCDONOUGH, HOLLAND & ALLEN
1999 HARRISON STREET, STE 1300
OAKLAND CA 94612
(510) 839-9104

Joelle Ogg
JOHN & HENGERER
1200 17TH STREET, NW, STE 600
WASHINGTON DC 20036
(202) 429-8812
jogg@jhenergy.com

Ralph Smith
LARKIN & ASSOCIATES, INC.
15728 FARMINGTON ROAD
LIVONIA MI 48154
(734) 522-3420
ad046@detroit.freenet.org
For: Larkin & Associates, Inc.

Karen Lindh
LINDH & ASSOCIATES
7909 WALERGA ROAD, ROOM 112, PMB 119
ANTELOPE CA 95843
(916) 729-1562
karen@klindh.com
For: California Manufacturers Assn.

Richard Mccann Ph.D
M.CUBED
2655 PORTAGE BAY, SUITE 3
DAVIS CA 95616
(530) 757-6363
rmccann@cal.net

Kay Davoodi
NAVY RATE INTERVENTION OFFICE
WASHINGTON NAVY YARD
1314 HARWOOD STREET SE
WASHINGTON NAVY YARD DC 20374-5018
(202) 685-0130
DavoodiKR@efaches.navfac.navy.mil
For: Navy Rate Intervention

Martin Mattes
Attorney At Law
NOSSAMAN GUTHNER KNOX & ELLIOTT, LLP
50 CALIFORNIA STREET, 34TH FLOOR
SAN FRANCISCO CA 94111-4799
(415) 438-7273
mmattes@nossaman.com

Kris Cheh
O'MELVENY & MYERS LLP

APPENDIX A
******* SERVICE LIST *******
Last Update on 05-SEP-2001 by: SMJ
A0011038 LIST
A0011056/A0010028

For: City of Paso Robles

Christopher J. Mayer
MODESTO IRRIGATION DISTRICT
PO BOX 4060
MODESTO CA 95352-4060
(209) 526-7430
chrism@mid.org
For: MODESTO IRRIGATION DISTRICT (MID)

Robert B. Weisenmiller
MRW & ASSOCIATES
1999 HARRISON STREET, SUITE 1440
OAKLAND CA 94612-3517
(510) 834-1999
rbw@mrwassoc.com
For: MRW & Associaes

Gary Herbert
MSDW
ONE TOWER BRIDGE, 11TH FLOOR
WEST CONSHOCKEN PA 19428
(610) 940-4524
gerhardt.herbert@msdw.com

Melanie Gillette
NAVIGANT CONSULTING INC
3100 ZINFANDEL DRIVE, SUITE 600
RANCHO CARDOVA CA 95670
(916) 852-1300
melanie_gillette@rmiinc.com

Dan Pease
PACIFIC GAS AND ELECTRIC COMPANY
MAILCODE B10B
PO BOX 70000
SAN FRANCISCO CA 94177
drp6@pge.com

Ed Lucha
PACIFIC GAS AND ELECTRIC COMPANY
MAIL CODE: B9A
PO BOX 770000
SAN FRANCISCO CA 94177
(415) 973-3872
ell5@pge.com

Janice Frazier-Hampton
PACIFIC GAS AND ELECTRIC COMPANY

400 SOUTH HOPE STREET
LOS ANGELES CA 90071
(213) 430-6463
kcheh@omm.com

Eve Mitchell
OAKLAND TRIBUNE
401 13TH ST.
OAKLAND CA 94612
(510) 208-6474
emitchel@angnewspapers.com

Jonathan Jacobs
PA CONSULTING GROUP
75 NOVA DRIVE
PIEDMONT CA 94610-1037
(510) 654-9495
jon.jacobs@paconsulting.com
For: PA CONSULTING GROUP

Gail L. Slocum
Attorney At Law
PACIFIC GAS AND ELECTRIC CO.
77 BEALE ST. RM 3143
SAN FRANCISCO CA 94105
(415) 973-6583
glsg@pge.com

Bruce Bowen
Mailcode B10a
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 770000
SAN FRANCISCO CA 94177
brb3@pge.com

Roxanne Piccillo, Regulatory Analysis
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., ROOM 1075
SAN FRANCISCO CA 94105
(415) 973-6593
rtp1@pge.com

George A. Perrault
1813 FAYMONT AVENUE
MANHATTAN BEACH CA 90266
(310) 379-0901
georgeperrault@msn.com

Henry Moore
PETERSON RISK CONSULTING, LLC
1 MARKET STREET, SUITE 1300
SAN FRANCISCO CA 94105

APPENDIX A
******* SERVICE LIST *******
Last Update on 05-SEP-2001 by: SMJ
A0011038 LIST
A0011056/A0010028

MAIL CODE B9A
PO BOX 770000
SAN FRANCISCO CA 94177
(415) 973-2254
jyf1@pge.com

Mark R. Huffman
Attorney
PACIFIC GAS AND ELECTRIC COMPANY
MAIL CODE B30A
PO BOX 77000
SAN FRANCISCO CA 94177
(415) 973-3842
mrh2@pge.com

Niels Kjellund
PACIFIC GAS AND ELECTRIC COMPANY
MAIL CODE 859A
PO BOX 770000
SAN FRANCISCO CA 94177
NXK2@pge.com

Roger J. Peters
PACIFIC GAS AND ELECTRIC COMPANY
MAIL CODE B30A
PO BOX 7442
SAN FRANCISCO CA 94120
RJP2@pge.com

Ron Helgens
PACIFIC GAS AND ELECTRIC COMPANY
MAIL CODE B9A
PO BOX 770000
SAN FRANCISCO CA 94177
(415) 973-7524
rrh3@pge.com

Michael Bazeley
SAN JOSE MERCURY NEWS
111 ELLIS STREET, 3RD FLOOR
SAN FRANCISCO CA 94102
(415) 434-1018
mbazeley@sjmercury.com

James E. Hay, SEMPRA ENERGY
101 ASH STREET - H.Q. 14B
SAN DIEGO CA 92101-3017
(619) 696-2141
jhay@sempra.com
For: Sempra

Judy Peck

(415) 393-0588
hwmoore@pcit.com

Theodore Huang
PRICE WATERHOUSE COOPERS
199 FREMONT
SAN FRANCISCO CA 94105
(415) 498-6529
theodore.huang@us.pwclobal.com
For: PRICE WATERHOUSE COOPERS

Margery Neis
PRICEWATERHOUSECOOPERS, LLP
199 FREMONT STREET, 8TH FLOOR
SAN FRANCISCO CA 94105
margery.a.neis@us.pwcglobal.com

Jean Pierre Batmale, REALENERGY
1900 AVENUE OF THE STARS, 755
LOS ANGELES CA 90067
(310) 203-2976
jpbatmale@realenergy.com

Carrie Peyton, SACRAMENTO BEE
PO BOX 15779
SACRAMENTO CA 95852
(916) 321-1086
cpeyton@sacbee.com

Tim Haines
SACRAMENTO MUNICIPAL UTILITY DISTRICT
PO BOX 15830
SACRAMENTO CA 95852-1830
(916) 732-6342
thaines@smud.org
For: Sacramento Municipal Utility District

Frank J. Cooley
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD CA 91770
(626) 302-3115
frank.cooley@sce.com
For: SOUTHERN CALIFORNIA EDISON COMPANY (SCE)

Stephen E. Pickett
RONALD L. OLSON
Attorney At Law
SOUTHERN CALIFORNIA EDISON COMPANY
2244 WALNUT GROVE AVENUE
ROSEMEAD CA 91770
(626) 302-1903

APPENDIX A
******* SERVICE LIST *******
Last Update on 05-SEP-2001 by: SMJ
A0011038 LIST
A0011056/A0010028

Admin. State Regulatory Relations
SEMPRA ENERGY
601 VAN NESS AVENUE, SUITE 2060
SAN FRANCISCO CA 94102
(415) 202-9986
jpeck@sempra.com

Lynn G. Van Wagenen
Regulatory Affairs Project Manager
SEMPRA ENERGY
101 ASH STREET, ROOM 10A
SAN DIEGO CA 92101
(619) 696-4055
LVanWagenen@sempra.com
For: Sempra Energy

Theodore Roberts, Attorney At Law
SEMPRA ENERGY
101 ASH STREET, HQ 13D
SAN DIEGO CA 92101
(619) 699-5195
troberts@sempra.com

G. Darryl Reed
SIDLEY & AUSTIN
10 S. DEARBORN
CHICAGO IL 60603
(312) 853-7766
gdreed@sidley.com
For: SIDLEY & AUSTIN

Bruce Foster
Regulatory Affairs
SOUTHERN CALIFORNIA EDISON COMPANY
601 VAN NESS AVENUE, SUITE 2040
SAN FRANCISCO CA 94102
(415) 775-1856
fosterbc@sce.com

Sam Wise
4045 PALOS VERDES DR. NORTH
ROLLING HILLS ESTATES CA 90274
(310) 377-1577

picketse@sce.com

Charles C. Read
Attorney At Law
STEPTOE & JOHNSON, LLP
1330 CONNECTICUT AVENUE, N.W.
WASHINGTON DC 20036
(202) 429-6244
cread@steptoe.com

Peter Fox-Penner, Ph.D.
THE BRATTLE GROUP
1133 20TH STREET NW, SUITE 800
WASHINGTON DC 20036
(202) 955-5050
peter_fox-penner@brattle.com

Fred Wesley Monier
TURLOCK IRRIGATION DISTRICT
PO BOX 949
333 EAST CANAL DRIVE
TURLOCK CA 95381-0949
(209) 883-8321
fwmonier@tid.org

Bill C. Wells, Lt. Col.
TYNDALL AFB
139 BARNES DRIVE, SUITE 1
TYNDALL AFB FL 32403-5319
(850) 283-6347
bill.wells@tyndall.af.mil
For: AIR FORCE LEGAL SERVICES AGENCY

Lulu Weinzimer
9 ROSCOE STREET
SAN FRANCISCO CA 94110-5921
(415) 824-3222
luluw@newsdata.com

APPENDIX A
******* SERVICE LIST *******
Last Update on 05-SEP-2001 by: SMJ
A0011038 LIST
A0011056/A0010028

(END OF APPENDIX A)